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September 10, 2010
(PBW Project No. 1584)

VIA FEDERAL EXPRESS

Mr. Gary Miller
Superfund Division, Region 6 (6SF-RA)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: August 2010 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including: (1) preparation of replacement pages for the Final Baseline Ecological Risk Assessment (BERA) Problem Formulation (PF) and BERA Work Plan and Sampling and Analysis Plan (WP/SAP), both dated June 21, 2010, to address modifications requested in your letter dated August 4, 2010; and (2) performance of BERA field and laboratory activities described in the BERA WP-SAP.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
 - Field measurements collected as part of BERA field activities performed in August are summarized on Tables 1 and 2 attached to this letter.



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3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
 - Performance of laboratory analytical and testing activities as described in the BERA WP-SAP;
 - Preparation of the BERA 60-day deliverable, which will include a summary of field activities, laboratory analytical results, a data validation summary, and an associated data validation checklist; and
 - Preparation of the Draft Preliminary Site Characterization Report (PSCR), which will include a description of BERA field activities and the complete set of BERA data.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Although not required by the UAO, the Respondents listed above have been working with EPA on developing: (1) an Administrative Settlement Agreement and Order on Consent (AOC) for a Time-Critical Removal Action for tank removal activities at the former tank farm area at the Site; and (2) a separate AOC for preparation of an Engineering Evaluation and Cost Analysis (EE/CA) for a Non-Time-Critical Removal Action to address wetland and pond sediment areas, and repair the former surface impoundments cap.

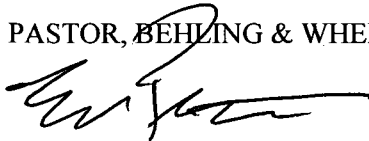
In regard to number 1 above, the Respondents are continuing to await EPA to provide a revised draft AOC for the tank removal activities. The Respondents view the diligent initiation and completion of tank removal activities as extremely important in light of the current hurricane season. Depending on the progress toward the finalization of this AOC, other actions, in addition to those described above, may be performed during the next two months.

In regard to number 2 above, Respondents and EPA were not able to agree on an AOC and Statement of Work (SOW) for the EE/CA and no further efforts in that regard are currently anticipated.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

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cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Ray Merrell – Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Donnie Belote - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP

Table 1
Gulfco BERA Field Sampling Parameters - Sediment

Sample Area/Type	Sample ID	Date	pH	ORP (mV)	Temperature (°C)
ICWW Sediment/ Porewater	EIWSED01	8/18/2010	6.70	-2.6	31.4
	EIWSED02	8/18/2010	6.80	-4.5	31.3
	EIWSED03	8/18/2010	6.90	-10.8	31.1
	EIWSED04	8/21/2010	6.86	-6.5	31.4
	EIWSED05	8/18/2010	6.89	-8.5	31.5
	EIWSED06	8/18/2010	7.04	-19.3	31.9
	EIWSED07	8/18/2010	6.82	-4.3	31.8
	EIWSED01PW	8/20/2010	7.21	-28.2	30.2
	EIWSED02PW	8/20/2010	7.01	-16.5	30.2
	EIWSED03PW	8/20/2010	7.07	-21.2	30.3
	EIWSED04PW	8/21/2010	6.37	19.4	29.5
	EIWSED05PW	8/21/2010	6.25	28.4	29.8
	EIWSED06PW	8/22/2010	6.77	-1.3	29.5
	EIWSED07PW	8/30/2010	6.37	113.5	30.7
Wetland Sediment/ Porewater	EWSED01	8/24/2010	6.85	-18.0	30.6
	EWSED02	8/24/2010	6.43	10.2	31.4
	EWSED03	8/23/2010	NA	NA	32.6
	EWSED04	8/23/2010	6.65	263.9	30.8
	EWSED05	8/24/2010	6.23	63.4	37.8
	EWSED06	8/23/2010	7.19	176.1	31.7
	EWSED07	8/23/2010	6.80	216.2	31.3
	EWSED08	8/24/2010	6.95	10.6	31.7
	EWSED09	8/24/2010	6.98	80.5	37.3
	EWSED01PW	8/26/2010	6.59	88.4	29.3
	EWSED02PW	8/26/2010	6.89	-273.8	27.5
	EWSED04PW	8/27/2010	7.05	103.0	27.9
	EWSED06PW	8/31/2010	6.40	30.8	29.1
	EWSED07PW	8/30/2010	6.37	113.5	30.7
	EWSED08PW	8/25/2010	5.41	140.2	32.2
NA -Parameter Not Collected					
<p>Note: Data collected prior to disturbance of location for sampling. For example, EIWSED01 and EIWSED01PW were the same location, but different days prior to sediment collected for sediment sampling and pore water sampling, respectively. The data listed for the pore water samples is not from the extracted pore water, but the sediment prior to collection and extraction.</p>					

Table 2
Gulfco BERA Field Sampling Parameters - Water

Sample Area/Type	Sample ID	Date	Water Depth (ft)	pH	Conductivity (mS)	Temperature (oC)	Salinity (ppt)	DO (mg/L)
ICWW Sediment/ Porewater	EIWSED01	8/18/2010	1.0	7.97	43.94	30.11	25.41	5.11
			4.0	7.98	43.94	30.11	25.42	5.39
			6.9	7.99	43.94	30.11	25.42	5.74
	EIWSED02	8/18/2010	1.0	8.01	43.68	30.15	25.23	4.29
			3.5	8.06	43.66	30.09	25.24	4.35
	EIWSED03	8/18/2010	1.0	8.03	43.90	30.16	25.20	4.81
			1.9	8.09	43.60	30.80	25.19	8.09
	EIWSED04	8/21/2010	1.4	7.95	44.18	30.47	25.40	4.70
	EIWSED05	8/18/2010	1.0	7.97	39.96	30.62	25.35	5.15
			2.6	7.96	40.02	30.40	25.40	5.90
	EIWSED06	8/18/2010	1.0	8.01	38.21	31.51	24.10	6.56
			3.6	7.97	42.95	31.59	24.08	7.23
	EIWSED07	8/18/2010	1.0	8.04	42.69	31.63	23.88	6.86
			3.0	8.06	42.77	31.63	23.92	6.94
			6.3	8.07	42.84	31.62	23.95	6.95
	EIWSED01PW	8/20/2010	1.0	7.76	46.68	28.81	27.94	4.62
			3.0	7.76	46.71	28.80	27.94	4.82
			6.0	7.76	46.71	28.80	27.99	4.79
	EIWSED02PW	8/20/2010	1.0	7.76	46.70	28.87	27.90	5.03
			3.6	7.76	46.72	28.89	27.92	5.24
	EIWSED03PW	8/20/2010	1.5	7.74	43.29	29.18	27.76	5.50
	EIWSED04PW	8/21/2010	1.0	7.94	46.57	28.25	28.18	4.19
			2.8	7.94	46.52	28.20	28.18	4.05
	EIWSED05PW	8/21/2010	1.0	7.94	43.81	28.24	28.16	4.74
			3.0	7.95	43.82	28.27	28.17	5.08
	EIWSED06PW	8/22/2010	1.0	8.16	43.57	28.11	27.99	4.52
			3.0	8.15	43.57	28.11	28.00	4.73
			4.9	8.09	43.57	28.11	27.99	4.87
	EIWSED07PW	8/30/2010	1.0	6.52	59.35	29.74	35.95	8.01
			3.5	6.52	58.49	29.67	36.00	8.06
			6.9	6.59	59.36	29.57	36.00	7.71
Surface Water	EWSW01	8/30/2010	0.1	5.86	77.38	35.37	43.23	3.78
	EWSW04	8/30/2010	0.1	7.19	75.53	35.91	41.69	5.00
Marsh Porewater	EWSED06PW	8/31/2010	0.1	7.17	51.66	27.84	31.93	3.80
Note: Data collected prior to disturbance of location for sampling. For example, EIWSED01 and EIWSED01PW were the same location, but different days prior to sediment collected for sediment sampling and pore water sampling, respectively. The data listed for the pore water samples is not from the extracted pore water, but the overlying water prior to collection and extraction.								